IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

The State of Texas, et. al.,

Plaintiffs,

Case No. 4:20-CV-957-SDJ

v.

Google LLC,

Hon. Sean D. Jordan

Defendant.

PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff State of Texas, on behalf of the Plaintiff States, respectfully requests leave to file under seal Plaintiffs' unredacted Amended Complaint. The Amended Complaint contains confidential and sensitive third-party information and highly confidential information produced by defendant Google LLC ("Google").

The Court previously granted Plaintiffs' Motion for Leave to File Unredacted Complaint Under Seal to protect confidential information produced by Google and third parties. (Dkt. 3.) Plaintiffs seek to afford consistent treatment to the confidential third-party and Google information reflected in the Amended Complaint. Plaintiffs therefore respectfully request that the Court grant Plaintiffs leave to file the unredacted Amended Complaint under seal.

Dated: March 15, 2021

/s/ Ashley Keller

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Attorneys for Plaintiff States of Texas, Idaho, South Dakota, and North Dakota

On behalf of all Plaintiff States

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7(h), I certify that Zeke DeRose, counsel for the State of Texas, conferred about this Motion by teleconference with Paul Yetter, counsel for Google, on March 12, 2021, during which call Mr. Yetter represented that Google does not oppose the Motion.

<u>/s/ Ashley Keller</u> Ashley Keller

CERTIFICATE OF SERVICE

I certify that on March 15, 2021, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Ashley Keller Ashley Keller